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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a
California Corporation,
UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation, and
MULTIPLAN, INC., a New York corporation,

Defendants.

CASE NO. 4:20-cv-02254-YGR

**DEFENDANTS' MOTION FOR
ADMINISTRATIVE RELIEF PURSUANT
TO L.R. 7-11 FOR LEAVE TO FILE TEN
ADDITIONAL PAGES FOR THEIR
MEMORANDUM IN OPPOSITION TO
CLASS CERTIFICATION**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020
Third Amended Complaint filed: Sept. 10, 2021

ARGUMENT

Defendants United Healthcare Insurance Company, United Behavioral Health, and MultiPlan, Inc. respectfully request leave, pursuant to Civil Local Rule 7-11, to file a consolidated 35-page memorandum of law in support of their forthcoming opposition to Plaintiffs' motion for class certification, in lieu of filing two separate 25-page briefs by different defendants. Defendants requested, and the Court granted, similar relief for their opposition to Plaintiffs' first motion for class certification. Dkts. 196, 199.

Civil Local Rule 7-11 permits a party to move for miscellaneous administrative relief, including a motion "to exceed otherwise applicable page limitations." Good cause exists for the requested relief. Under Civil Local Rule 7-4(b), each party is entitled to submit a memorandum of points and authorities in opposition of twenty-five (25) pages in length. Defendants' briefs are due on March 14, 2024 (Dkt. 389). Rather than submitting up to fifty (50) pages of briefing (one brief for the United Defendants and another one for MultiPlan), Defendants propose to submit a single consolidated opposition brief of thirty-five (35) pages. As with Plaintiffs' initial class certification motion, Plaintiffs' arguments in support of their renewed motion for class certification present complex issues under ERISA and RICO that overlap as to each Defendant. Therefore, judicial economy would be served by a single, consolidated submission that contains all of Defendants' arguments in opposition, rather than two separate briefs which may entail some level of duplication. Plaintiffs have indicated they will not oppose the requested relief. Blas Decl. ¶ 3. Defendants respectfully seek this Court's permission to file a consolidated 35-page brief.

1 DATED: February 21, 2024

Respectfully submitted,

2 GIBSON, DUNN & CRUTCHER LLP

3 By: /s/ Lauren M. Blas

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